

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS SECURITIES  
AND ERISA LITIGATION

This Document Applies To:

*In re Lehman Brothers Equity/Debt  
Securities Litigation*, 08-CV-5523-LAK

Case No. 09-MD-2017 (LAK)

ECF CASE

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR  
LIMITED RELIEF FROM THE PSLRA DISCOVERY STAY**

PLEASE TAKE NOTICE that, upon the accompanying Lead Plaintiffs' Memorandum of Law in Support of Their Motion for Limited Relief from the PSLRA Discovery Stay and the Declaration of David R. Stickney and attached exhibits, Lead Plaintiffs Alameda County Employees' Retirement Association, the Government of Guam Retirement Fund, the Northern Ireland Local Government Officers' Superannuation Committee, the City of Edinburgh Council as Administering Authority of the Lothian Pension Fund, and Operating Engineers Local 3 Trust Fund, by and through their undersigned attorneys, will move before the Honorable Lewis A. Kaplan, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York 10007, on such date as the Court will determine, for an Order granting Lead Plaintiffs' motion for partial modification of the discovery stay imposed by the Private Securities Litigation Reform Act of 1995.

PLEASE TAKE FURTHER NOTICE that, pursuant to the local rules for the Southern District of New York, any opposing papers must be served and filed within ten business days of

service of these motion papers. Reply papers, if any, must be served and filed within five days of service of opposing papers.

Dated: October 13, 2009

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